

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

Jane Doe 1, Jane Doe 2, Jane Doe 3, Jane Doe) Civil Action No.: 6:22-cv-02957-HMH
4, Jane Doe 5, Jane Doe 6, Jane Doe 7, John)
Doe 1, John Doe 2, and John)
and Jane Does 1-100,)

Plaintiffs,)

v.)

Varsity Brands, LLC; Varsity Spirit, LLC;)
Varsity Brands Holding Company, Inc.; U.S.)
All Star Federation; USA Federation of Sport)
Cheering d/b/a USA Cheer; Jeffrey Webb,)
Charlesbank Capital Partners, LP; Bain)
Capital, LP; Rockstar Cheer & Dance, Inc.,)
Katherine Anne Foster as the personal)
representative of the Estate of Scott Foster;)
Kathy Foster individually, Kenny Feeley, Josh)
Guyton, Nathan Allan Plank, Christopher)
Hinton, Tracy a/k/a or f/k/a Traevon Black,)
Peter Holley, and other Unknown Defendants,)

Defendants.)

**PLAINTIFF JANE DOE 1’S
ALTERNATIVE DISPUTE
RESOLUTION (“ADR”) STATEMENT
AND CERTIFICATION**

Pursuant to Local Civil Rule 16.03, the undersigned certifies that he has (1) provided the Plaintiff Jane Doe 1 with any materials relating to ADR which were required to be provided by Local Civil Rule 16.01 or order of the Court; (2) discussed the availability of ADR mechanisms with the party; and (3) discussed the advisability and timing of ADR with opposing counsel.

Submitted¹ this 2nd day of August, 2023.

¹ This statement must be filed and served. Local Rule 16.03, D.S.C. A separate statement and certification is required for each party represented.

STROM LAW FIRM, LLC

s/ Bakari T. Sellers

Bakari T. Sellers, SC Fed. ID No. 11099
Jessica L. Fickling, SC Fed. ID No. 11403
Joseph Preston Strom, SC Fed. ID No. 4354
Mario A. Pacella, SC Fed. ID No. 7538
Amy E. Willbanks, SC Fed. ID No. 13537
Alexandra Benevento, SC Fed. ID No. 10734
6923 N. Trenholm Road, Suite 200
Columbia, South Carolina 29206
Phone: (803) 252-4800
Facsimile: (803) 252-4801
Email: bsellers@stromlaw.com
petestrom@stromlaw.com
mpacella@stromlaw.com
awillbanks@stromlaw.com
jfickling@stromlaw.com
abenevento@stromlaw.com

GAFFNEY LEWIS, LLC

Amy L. Gaffney, SC Fed. ID No. 6316
171 Church Street, Suite 160
Charleston, South Carolina 29401
Phone: (803) 790-8838
Facsimile: (803) 790-8841
Email: agaffney@gaffneylewis.com

Regina Hollins Lewis, SC Fed. ID No. 7553
3700 Forest Drive, Suite 400
Columbia, South Carolina 29204
Phone: (803) 790-8838
Facsimile: (803) 790-8841
Email: rlewis@gaffneylewis.com

**MCGOWAN, HOOD, FELDER & PHILLIPS,
LLC**

S. Randall Hood, SC Fed ID 6103
Chad A. McGowan, SC Fed ID 6620
1539 Health Care Drive
Rock Hill, SC 29732
Phone: (803) 327-7800
Facsimile: (803) 324-1483
rhood@mcgowanhood.com
cmcgowan@mcgowanhood.com

Whitney Boykin Harrison, SC Fed ID 11604
1517 Hampton Street
Columbia, South Carolina 29201
Phone: (803) 779-0100
Facsimile: (803) 787-0750
wharrison@mcgowanhood.com

Attorneys for the Plaintiffs